

1/28/05

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New Orleans, Louisiana
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VIA FACSIMILE AND U.S. MAIL

RE: RRG/Clayton Chemical Site (the "Site")

Dear Mr. Turner,

On behalf of Ingram Barge Company for Walker's Midstream Fuel and Service Company (collectively here Ingram) we are responding to the November 22, 2004 letter from Mr. Thomas Geishecker regarding the RRG/Clayton Chemical Site General Notice of Potential Liability. The U.S. EPA granted an extension of time to respond to the notice letter until today, January 28, 2005. With this notice letter, the United States Environmental Protection Agency (EPA) requested that 68 of the over 2,800 potentially responsible parties (PRPs) indicate a willingness to perform or finance the response activities at the RRG/Clayton Chemical Site (Site) and to reimburse EPA for costs incurred to date.

A meeting of notice recipients was held in St. Louis, Missouri on January 25, 2005 to discuss the EPA's requests. Although there seemed to be significant interest in forming a group to address this matter, there were a number of issues raised that need to be addressed. These issues include the scope of the project, notice to additional PRPs (including owners, operators and potential de minimis parties), access to perform the work, brownfields redevelopment options and the nature of any releases. In addition, we have no information concerning the contribution protection that the Agency is willing to provide members of such a group. These issues make it difficult to form a group immediately. However, we will continue to work with the EPA and with the others noticed toward resolution of these matters.



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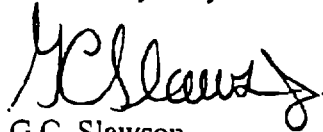
We understand that others that met on January 25 are providing you with a more detailed listing and description of the above-listed issues that are of concern in organizing a group to address this Site. Thus, we will not duplicate those details here, but generally support the effort to obtain additional information for the requested cleanup effort. In addition, Ingram is continuing its internal investigation of its association with the Site. These efforts may also bear on the continuing efforts outlined above.

To facilitate cooperation between the PRPs and the EPA, our understanding is that certain PRPs will be contacting the Agency to discuss technical issues related to the scope of the requested project. Concurrently, others will be contacting the EPA on the additional notice and other PRP issues.

In sum, Ingram is interested in cooperating with and participating in a group, if one can be formed. We are willing to work with the EPA and with the others who received the notice letter to accomplish that goal.

If you have any questions or concerns regarding this matter, please feel free to contact me. My contact information is listed below.

Yours very truly,



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Jan 28-05

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COMMENTS:

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